# Commonwealth of Kentucky Division for Air Quality

# PERMIT STATEMENT OF BASIS

TITLE V DRAFT NO. V-03-046
TOKICO (USA), INC.
BEREA, KY.
JUNE 22, 2004
AARON NEWTON, REVIEWER
PLANT I.D. # 21-151-00042
APPLICATION LOG # 50840

#### **SOURCE DESCRIPTION:**

Tokico (USA) is a hard chromium electroplating facility in Berea, Kentucky and has applied for a Title V permit as required by 40 CFR 63 Subpart N – National Emission Standards for Chromium Emissions from Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks. The plant consists primarily of 2 coating lines (each capable of processing approximately 960 pieces per hour) and 4 chromium electroplating lines (each capable of plating 360 struts per hour). The shocks and struts are for use in automobiles. The permit also covers 6 small boilers with a total capacity of 18.75 mmBTU.

# **COMMENTS:**

# **ELECTROSTATIC SPRAY PAINTING OPERATIONS-**

EP01 AND EP02 apply a water based paint from an electrostatic spray gun. Emissions are based on consultant estimates. Particulate emissions are controlled by dry booth filters at 99% efficiency. 401 KAR 59:010 applies. 401 KAR 59:225 Miscellaneous Metal Parts will not apply as Madison county is an attainment area and the source is not considered a major source as defined in 401 KAR 59:001.

#### CHROMIUM PLATING OPERATIONS-

EP03, EP04, EP05, EP06 are controlled by composite mesh pad scrubber for an efficiency of 99.5%. Emission factors for emissions of PM and Chromium compounds are taken from AP-42. The applicable regulation is 40 CFR 63 Subpart N, along with 401 KAR 59:010.

### **BOILERS-**

There are six small natural gas fired boilers involved in process operations with a combined capacity of 18.75 mmBTU/hr.

#### **CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.